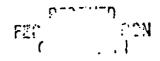
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FEDERAL ELECTION COMMISSION Washington, DC 20463

2016 NOV 14 PM 12: 15

CELA 2 TO: The Commission 3 4 FROM: Kathleen Guith Acting Associate General Counsel for Enforcement 5 6 7 Stephen Gura 8 Deputy Associate General Counsel for Enforcement 9 Mark Shonkwiler 10 BY: **Assistant General Counsel** 11 12 13 Saurav Ghosh 14 Attorney 15 MUR 6761 (Teresa Wheatley, et al.) **SUBJECT:** 16

Pre-Probable Cause Conciliation On October 18, 2016, the Commission found reason to believe that Teresa Wheatley violated 52 U.S.C. § 30122 by making \$5,000 in contributions to Dewhurst for Texas with funds

that she personally transferred to her bank account from the bank account of Alexander Consulting Group, LLC, the consulting business of Kenneth A. "Buddy" Barfield. The Commission authorized pre-probable cause conciliation with Wheatley, and approved a

conciliation agreement

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> We believe that this agreement sufficiently vindicates the Commission's enforcement interests under the circumstances presented. We therefore recommend that the Commission accept the attached signed agreement and close the file in this matter.

RECOMMENDATIONS

- Accept the attached signed conciliation agreement with Teresa Wheatley. 31 1.
- 32 2. Approve the appropriate letter.
- Close the file. 33 3.

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